

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

BRIDGESTONE SPORTS CO., LTD.,  
and BRIDGESTONE GOLF, INC.,

Plaintiffs,

v.

ACUSHNET COMPANY,

Defendant.

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C. A. No. 05-132 (JJF)

**ACUSHNET COMPANY'S PROPOSED VOIR DIRE**

Pursuant to D. Del. L.R. 47.1(a), Acushnet Company hereby submits the following proposed voir dire to the jury panel.

Good morning, ladies and gentlemen. I am Judge Farnan, and I will be presiding over the trial for which a jury is about to be drawn in the case captioned *Bridgestone Sports Co., Ltd. and Bridgestone Golf, Inc. v. Acushnet Co.* Briefly stated, this is a patent action arising under the patent laws of the United States involving golf ball technology.

The trial will last \_\_\_\_ days. I time my trials, so the attorneys have to complete their trial presentations within these limits. However, jury deliberations may require you to be present longer than \_\_\_\_ days. Our trial days will run approximately from 9:30 a.m. to 4:30 p.m.

I will now ask you certain questions, the purpose of which is to (1) enable the court to determine whether or not any prospective juror should be excused for cause; and (2) enable counsel for the parties to exercise their individual judgment with respect to peremptory challenges, that is, challenges for which no reason need be given by counsel. If any of you answer any question "yes," please stand up and, upon being recognized by the court, state your

juror number. When I have concluded asking all the questions, we will call you to the bench individually to speak with you about your affirmative response or responses.

HAVE CLERK ADMINISTER THE OATH TO THE PANEL

1. You have been given a list of companies.
  - a) Is anyone personally acquainted with any officer, director, or employee of any of Bridgestone Sports, Bridgestone Golf, or Acushnet Company?
  - b) Do you or any members of your households now own, or ever owned, any stocks or bonds in any of Bridgestone Corporation, a Japanese Company or Fortune Brands, Inc.?
  - c) Have you, any family member, or anyone close to you had any dealings with, or relied financially in any way on, any of these companies?
  - d) Have you, any family member, or anyone close to you had any negative experiences with any products of any of those companies?
2. You have been given a list of the attorneys and law firms involved in this litigation. Are you related to, or personally acquainted with, any of those attorneys, or have you ever been represented by any of those attorneys or other associates or members of the listed law firms?
3. You have been given a list of the individuals who might appear as witnesses in this case. Are you related to, or personally acquainted with, any of those individuals?
4. You have been given a list of subject areas. Have you, or any family member, or anyone close to you ever been educated, employed, trained, or had any in experience any of the listed areas?
5. Do you have any personal knowledge of this case, or have you read or heard it discussed, or have an opinion regarding it?

6. Does anyone have any type of condition that would make it difficult or impossible for you to serve as a member of the jury in this case?

7. Does anyone have difficulty speaking, reading, writing or understanding English?

8. This case may take up to two weeks to try. Are there any of you for whom service on the jury for that length of time would be a hardship?

9. Do any of you have any religious or moral beliefs that would interfere with being a member of this jury?

10. Has anyone ever been a plaintiff, a defendant, or a witness in a civil lawsuit?

a) If yes, please describe the suit and your role in the suit

11. Have you ever served as a juror in a civil or criminal lawsuit?

a) If yes, were you ever the foreperson or opinion leader of the jury?

12. Does anyone have any knowledge about or experience with patents, including applying for a patent?

a) If yes, please describe.

13. Have you, any member of your immediate family, or anyone close to you ever had any dealings with the United States Patent and Trademark Office?

14. Does anyone play golf or consider yourself to be a golfer?

a) How often do you golf?

b) Is there any particular brand of golf ball that you like to use?

i. If yes, which brand(s) do you like to use?

15. Has anyone ever heard of any of the following brands of golf balls:

a) Titleist

b) Pinnacle

- c) Nike
- d) Precept
- e) Bridgestone

If yes, have you, any family member, or anyone close to you had any positive or negative experiences with any products of any of those companies or brands?

16. Does anyone work for or belong as a member to the U.S. Golf Association called the "USGA"?

17. Did anyone get a degree in Chemistry, say in college or junior college?

a) What about a degree in any science?

18. Has anyone recently been the victim of a crime?

a) Has anyone recently been robbed?

19. Is anyone a lawyer by training? A patent lawyer? Is anyone married to a lawyer or have a patent lawyer in their family?

20. Does anyone know of any other matter which you believe should be called to the court's attention as having some bearing upon your qualifications or ability to sit as a juror, or which you think may prevent you from rendering a fair, unbiased and impartial verdict based solely upon the evidence and my instructions as to the law?

#### COMPANIES

Bridgestone Sports Co., Ltd.  
Bridgestone Golf, Inc.  
Bridgestone Corporation  
Acushnet Company  
Fortune Brands, Inc.

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**WITNESSES**

*See* Exh. Nos. 8 and 9 of the Pretrial Order,  
containing the list of Witnesses from  
Bridgestone and Acushnet.

**SUBJECT AREAS**

Golf or Golf Balls  
Golf Ball Design and Manufacturing  
Patents  
Rubber  
Chemistry  
Chemical Engineering

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**CERTIFICATE OF SERVICE**

I, David E. Moore, hereby certify that on May 22, 2007, the attached document was hand delivered to the following persons and was electronically filed with the Clerk of the Court using CM/ECF which will send notification to the registered attorney(s) of record that the document has been filed and is available for viewing and downloading:

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I hereby certify that on May 22, 2007, I have Electronically Mailed the documents to the following:

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